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Attorneys for Plaintiff and Real Party in Interest

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

INTERNATIONAL CHURCH

FOURSQUARE GOSPEL,

Plaintiff,

v.

CITY OF SAN LEANDRO, MICHAEL

J. GREGORY, SURLENE G. GRANT,

DIANA M. SOUZA, JOYSE R.

STAROSCIACK, BILL STEPHES, JIM

PROLA, JOHN JERMANIS, DEBBIE

) Case No.: CO7-03605-PJH-JCS

)

) **DECLARATION OF JOSEPHINE**
) **DEL RIO IN SUPPORT OF**
) **MOTION FOR PRELIMINARY**
) **INJUNCTION**

)

) Date: September 5, 2007

) Time: 9:00 a.m.

) Courtroom: 3

) Hon.: Phyllis J. Hamilton

)

)

DECLARATION OF JOSEPHINE DEL RIO

1 POLLART, DOES 1-50)
2 Defendants.)
3)
4 FAITH FELLOWSHIP FOURSQUARE)
5 CHURCH,)
6 Real Party in Interest.)
7)

8 I, Josephine Del Rio, do hereby declare as follows:

9 1. That if called upon, I could and would testify truthfully, as to my own
10 personal knowledge as follows:
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12 2. I am a Celebrate Recovery Ministry Member at Faith Fellowship
13 Worship Center, located at 577 Manor Boulevard, San Leandro, California 94579.
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15 3. My husband began attending the ministry before me. He has been
16 clean for twenty years and was struggling with a porn addiction. By attending the
17 meetings he was working through his problems and showing substantial
18 improvement. I began attending because my husband was attending. When I first
19 began attending I did not think that I had a problem. After I went to some meeting I
20 noticed that I did have problems with addiction. I realized that I was addicted to
21 controlling others, keeping secrets, and harboring anger. My addictions created
22 tension between my husband and me, further enlarged my anger issues, and made
23 me feel separated from society. After I realized my addictions I was able to begin
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DECLARATION OF JOSEPHINE DEL RIO

1 working on them. As a result, the ministry helped me realize my problems and
2 begin fixing them.

3 4. I know of ministry members who have lost everything and have lived
4 in a homeless shelter. Now, through celebrate recovery, they have a job and are
5 functioning as normal productive members of society. One of the ministry's goals is
6 to make people self sufficient, responsible, and to make them be able to take care of
7 themselves and their families. One way we do this is networking. A lot of these
8 people actually get jobs through networking in the ministry. Obtaining a job with a
9 negative personal history can be difficult; however, the ministry helps overcome this
10 impediment. The ministry helps people get off of governmental services and be
11 productive members of society.
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13 5. The ministry has helped me by providing free group and individual
14 counseling. Many people do not get counseling because of its tremendous cost.
15 Indeed, it is far cheaper to medicate than to mediate through counseling. Having
16 free counseling gives ministry members a path to break their addictions and deal
17 with their problems. The ministry has taught me how to deal with my problems and
18 not try to control my husband's decisions. In the ministry we receive peer group
19 counseling. Hearing the problems of your peers and identifying similarities and
20 ways to fix these problems motives me to act on our ideas. I use the solutions that
21 we develop in my everyday life. Additionally, in group therapy I get to me a mentor
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1 and mentee. For me, this is personally satisfying. Helping others gives me
2 confidence. If I can deal with someone else's problems then I can deal with my
3 own. In short, the free service that the ministry provides to its members is more
4 helpful than paid counseling and has helped me fix many problems in my life.

6 6. The community as a whole will be benefited if the Addiction ministry
7 is able to expand and grow. I can name a whole host of people who have benefited
8 from the program. For example, Robert Archuletta is one member who has turned
9 his life around. Robert went to jail for manslaughter. After he got out he began
10 attending the ministry. Currently, Robert is married and works for the Latino
11 Commission for Drugs. He shares his story and educates people about how bad
12 decisions affect others and lead to negative consequences. Expanding the ministry
13 will allow more people to receive free counseling assistance. By helping these
14 people we are assisting society. The ministry helps people become productive law
15 abiding citizens, which, in turn, makes the surrounding community stronger by
16 taking the burden of dealing with irresponsible people off of the community. The
17 ministry makes a difference with each person that they help.

22 7. Not being able to use the Catalina property takes away our ability to
23 conduct and expand this needed ministry service, which our practice of religion
24 requires.
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1 I declare, under penalty of perjury under the laws of the State of California
2 and the United States of America, that the foregoing is true and correct and is of my
3 own personal knowledge, and indicate such below by my signature executed on this
4 25th day of July, 2007, in the County of Alameda, City of San Leandro.
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10 /S/ Josephine Del Rio
11 Josephine Del Rio, Declarant
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15 **Attorney Attestation re Signature**

16 I hereby attest that I have on file all holograph signatures for any signatures
17 indicated by a "conformed" signature (/S/) within this efiled document.
18
19

20 /S/ Kevin Snider
21 Kevin T. Snider
22 Mathew B. McReynolds
23 Peter D. MacDonald
24 Attorneys for Plaintiff and
25 Real Party in Interest
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